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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

0429

July 30, 1993

Mr. William F. Caton
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Re: P.R. Docket 92-235

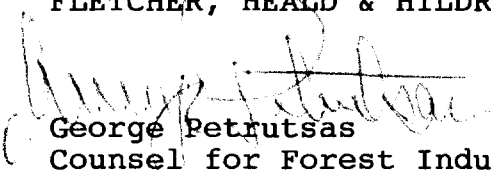
Dear Mr. Caton:

On behalf of Forest Industries Telecommunications, we are filing an original and fourteen (14) copies of its Reply Comments in the above-referenced rule making proceeding.

If there are any questions, please communicate with us.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH


George Petrutsas
Counsel for Forest Industrial
Telecommunications

GP:cej
Enclosures

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BEFORE THE

Federal Communications Commission

DOCKET FILE COPY ORIGINAL

WASHINGTON, D.C. 20554

In the Matter of

Replacement of Part 90 by Part 88
to Revise the Private Land Mobile
Radio Services and Modify the
Policies Governing Them

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PR Docket No. 92-235

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TO: The Commission

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY COMMENTS OF
FOREST INDUSTRIES TELECOMMUNICATIONS

Forest Industries Telecommunications (FIT) has submitted its views on the Commission's proposals in this proceeding as a member of the Coalition of Industrial and Land Transportation Land Mobile Users ("Coalition") in the comments and reply comments filed in the proceeding by that Coalition. The purpose of this filing is to comment further on the proposals for consolidating, or grouping, the current Industrial Radio Services submitted, respectively, by the National Association of Business and Educational Radio (NABER), the Utilities Telecommunications Council (UTC), and by the American Petroleum Institute (API).

NABER would group the Industrial Radio Services into two categories: Industrial I, to include the Forest Products, Special Industrial, Telephone Maintenance and the Motion Pictures, and Relay Press Radio Services. Industrial II would include the Power, Petroleum and the Manufacturers Radio Services. NABER Comments, p. 25. UTC would establish a Public Service Industrial Service to include the Power, Petroleum, and the Forest Products Radio Services. UTC also indicated that the Manufacturers and the

Telephone Maintenance Radio Services could be included in the Public Service Industrial Radio Service. UTC Comments, pp. 7-9. API proposes adding to the four categories proposed by the Commission a fifth, to be designated as Industrial Safety Service, to accommodate right-of-way companies (such as, pipelines, railroads, utilities) and other industrial entities that employ radio for essential safety communications (such as, manufacturing, forestry operations, heavy construction) and other activities involving potentially hazardous conditions. API Comments, pp. 6-9.

The Coalition itself has recommended grouping the Industrial Radio Services into two categories: An Industrial/Utilities Radio Service to include the Power, Petroleum, Forest Products, Manufacturers, and the Telephone Radio Service; and the Special

Products is primarily a safety service. Special Industrial is a "catch-all" service (See, Section 90.73 of the Commission's Rules for the eleven different categories of eligible activities in that radio service). Motion Pictures and Relay Press accommodate activities in which safety is not a major concern, as it is in the forest products industry.

Secondly, Forest Products shares very few frequencies with Special Industrial and none with Relay Press or Motion Pictures. The latter two services share all of their frequencies with Special Industrial. Forest Products shares nearly all of its frequencies with the Power, Petroleum, and the Manufacturers Radio Services, and has long ". . . established . . . working relationship . . . to provide the best recommendations . . . of the shared frequencies . . .", an essential requirement for members of the same group, according to NABER. See NABER Comments, p. 29.

More specifically, Forest Products shares over 40 frequencies with the Petroleum Radio Service in the 30-50 MHz band (at 48 MHz). It only shares 2 frequencies with the Special Industrial Radio Services in that band, and none with the Motion Pictures or Relay Press Radio Services. In the 150-160 MHz band, Forest Products shares 23 frequencies with the Petroleum and with the Manufacturers Radio Services, 20 other frequencies with Power and Petroleum. It shares only 5 (possibly 7) with Special Industrial and none with Motion Pictures or Relay Press. In the 450-470 MHz band, Forest Products shares most of its frequencies with Power, Petroleum, Manufacturers and Telephone Maintenance, but none with Special

Industrial, Motion Pictures, or Relay Press. Thus, placing Forest Products in the same group with Special Industrial, Motion Pictures, and Relay Press, as NABER has suggested, would not be placing together ". . . services currently sharing 150 and/or 450 MHz spectrum." See, NABER's White Paper, page 8.

Third, the frequencies allocated exclusively to the Power or Telephone Maintenance Radio Services are next to the frequencies allocated jointly to the Forest Products, Petroleum, Manufacturer, and Power Radio Services so that placing these services in the same group, as suggested by the Coalition and by UTC, will help maintain substantially contiguous spectrum within the group.

Sharing among the Power, Petroleum, Forest Products and the Manufacturers Radio Services has been successful partly because the operations of the forest products and of the Petroleum industries are substantially regional as opposed to nationwide. Forest products operations are conducted primarily in the Northwest, Southeast, Upper Northeast and the upper Midwest, near the Great Lakes. Petroleum operations are conducted mostly in and near the Gulf of Mexico, in California, and in several western and midwestern states. Therefore, substantial geographic compatibility exists between those two services. The successful sharing of frequencies with the Power and the Manufacturers Radio Services has been the result of successful coordination practices developed and perfected over the years.

In sum, while there has been substantial sharing and coordination experience among the Forest Products, Petroleum, Power

and Manufacturers Radio Services, there has been some such experience between Forest Products and Special Industrial but none between Forest Products and Motion Pictures or Relay Press.

Therefore, grouping the Forest Products Radio Services with Special Industrial, Motion Pictures and Relay Press, as NABER has suggested, would be a gross mismatch. Moreover, such an action would deprive the forest products industry of continued access to the frequencies it has long used and continues to use successfully on a shared basis with the other major Industrial Radio Services. In short, NABER's proposal for the consolidation of the Industrial Radio Services should be rejected.

API's proposal to create an Industrial Safety Service has substantial appeal. The forest products industry would fit well into such a service. In fact, FIT has supported the concept in industry discussions in the past. However, establishing an Industrial Safety Service at this time and all that such an action would involve (bringing together the many and diverse transportation, utilities, and industrial enterprises with safety communications requirements and reallocating a substantial amount of the land mobile radio spectrum), would be very difficult. Therefore, FIT does not support API's proposal. FIT submits, however, that the objective of the proposal -- to provide adequately for industrial and land transportation safety communications -- would be substantially achieved by the adoption of the Coalition/UTC proposal for an Industrial/Utilities Radio Service or for a Public Service Industrial Service to include the

Power, Petroleum, Forest Products, Manufacturers and Telephone
Maintenance Radio Service.

Respectfully submitted,

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